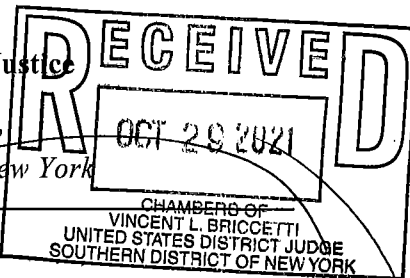


U.S. Department of Justice

United States Attorney  
Southern District of New York

United States District Courthouse  
300 Quarropas Street  
White Plains, New York 10601



October 29, 2021

**BY EMAIL & ECF**

The Honorable Vincent Briccetti  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**APPLICATION GRANTED  
SO ORDERED:**

*[Signature]*  
**Vincent L. Briccetti, U.S.D.J.**

**Dated:** 10/29/21  
**White Plains, NY**

**Re: United States v. Frank Brown, a/k/a "Nitty," et al., S1 20 Cr. 444 (VB)**

Dear Judge Briccetti:

The Government respectfully writes regarding defendant Frank Brown's suppression motion dated August 25, 2021. (See Docket Entries 113-17). The Government's current deadline to respond to the motion is October 29, 2021.

The Government is still in active plea negotiations with Mr. Gold, counsel to Mr. Brown, and the parties are hopeful that they will be able to reach a resolution of this matter in the coming weeks. Accordingly, the Government respectfully requests an additional two weeks—until November 12, 2021—to respond to the defendant's motion.

Very truly yours,

DAMIAN WILLIAMS  
United States Attorney

by: *[Signature]*

Benjamin A. Gianforti  
Assistant United States Attorney  
(646) 856-5190

cc: Ben Gold, Esq., counsel to Frank Brown (by ECF & email)  
Larry Sheehan, Esq., counsel to Pedro Rainey (by ECF & email)  
Daniel Parker, Esq., counsel to Joseph Scott (by ECF & email)  
Frank O'Reilly, Esq., counsel to Tonya Brown (by ECF & email)  
Sam Braverman, Esq. counsel to Keith Glover (by ECF & email)